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March 5, 2025

**BY ECF**

Hon. John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

Re: Diaz v. Melissa Aviles-Ramos et ano.  
1:25-cv-1241 (JGK)

Dear Judge Koeltl:

This office represents Defendants New York City Department of Education (DOE) and Melissa Aviles-Ramos, in her official capacity as Chancellor of the New York City Department of Education, in the above-referenced action brought pursuant to the Individuals with Disabilities Education Act (IDEA).

I write to request a 44-day extension of time for Defendants to respond to the Complaint, from today, March 5, 2025 until April 18, 2025. I apologize for the last-minute nature of this request, which regrettably deviates from Your Honor's Individual Practices. The extension is being requested in order to afford this office the opportunity to investigate the allegations in the complaint and to prepare an appropriate response.

This is Defendants' first request for an extension of time to respond to the Complaint, and Plaintiff consents. This request, if granted, would not affect any other deadlines.

Thank you for Your Honor's consideration.

Respectfully submitted,

/s/ MGT

Mark G. Toews

*Assistant Corporation Counsel*

cc. **BY ECF**  
Plaintiff's counsel